

The Honorable Robert J. Bryan

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

Case No. 3:17-cv-05806-RJB

**DECLARATION OF SHANNON  
ARMSTRONG IN SUPPORT OF  
DEFENDANT'S MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS AND  
METADATA**

I, Shannon Armstrong, declare:

1. I am a partner with the firm of Holland & Knight LLP, and one of the attorneys for defendant The GEO Group, Inc. ("GEO") in this matter. The following statements are true and correct and, if called upon, I could competently testify to the facts averred herein.

2. Based on the custodian metadata provided by the State of Washington ("State"), I understand that the State produced 178 documents from the Department of Corrections, two documents from the Department of Labor & Industries, three documents from the Department of Social and Health Services, and 231 documents from the Governor's Office.

3. I attach true and correct copies of the following documents in support of GEO's Motion to Compel Production of Documents and Metadata:

Exhibit	Description
1	GEO's First Set of Interrogatories and Requests for Production Propounded to the State of Washington.
2	GEO's Second Set of Requests for Production Propounded to the State of Washington.
3	GEO's Third Set of Requests for Production to State of Washington.
4	November 8, 2018 letter from GEO to the State regarding its discovery deficiencies.
5	November 30, 2018 letter from GEO to the State regarding its discovery deficiencies.
6	December 12, 2018 letter from GEO to the State regarding its privilege logs.
7	January 23, 2019 letter from GEO to the State regarding next steps following CR 37 conference.
8	January 24, 2019 letter from GEO to the State regarding its metadata deficiencies.
9	May 14, 2019 letter from GEO to the State regarding its production deficiencies.
10	State's supplemental common interest privilege log, produced on April 26, 2019.
11	May 20, 2019 letter from the State to GEO.
12	November 30, 2018 CR 37 letter from the State to GEO.
13	February 8, 2019 letter from the State to GEO re metadata deficiencies.
14	A screen shot taken May 23, 2019 showing an example of the metadata accompanying the State's document production.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: May 24, 2019

By: s/ Shannon Armstrong  
Shannon Armstrong, WSBA #45947  
Shannon.Armstrong@hklaw.com

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing DECLARATION OF SHANNON ARMSTRONG IN SUPPORT OF DEFENDANT'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND METADATA to be served on the following person[s]:

La Rond Baker  
Marsha Chien  
Andrea Brenneke  
Lane Polozola  
Office of the Attorney General  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
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*Attorneys for Plaintiff*

by causing the document to be delivered by the following indicated method or methods:

- ☒ by CM/ECF electronically mailed notice from the Court on the date set forth below.
- ☐ by mailing full, true and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or attorneys, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.
- ☐ by causing full, true, and correct copies thereof to be hand-delivered to the parties and/or their attorneys at their last-known office addresses listed above on the date set forth below.
- ☐ by sending full, true, and correct copies thereof, via overnight courier in sealed, prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or their attorneys, on the date set forth below.
- ☐ by faxing full, true, and correct copies thereof to the fax machines which are the last-known fax numbers for the parties' and/or attorneys' offices, on the date set forth below.

DATED: May 24, 2019.

s/ Kristin M. Asai  
Kristin M. Asai